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10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 EDITH WILLIAMS,)
13 Plaintiff,) Case No. 3:18-cv-00175-LRH-WGC
14 v.)
14 NANCY A. BERRYHILL,)
15 Acting Commissioner of Social Security,)
16 Defendant.)
17

18 **STIPULATION AND ORDER
FOR EXTENSION OF TIME FOR
DEFENDANT TO FILE OPPOSITION TO
PLAINTIFF'S MOTION TO REMAND**

19 IT IS HEREBY STIPULATED, by and between the parties, through their respective counsel of
20 record, that Defendant shall have an extension of time of 14 days to file her opposition to Plaintiff's
21 motion to remand, to be continued from September 14, 2018, to September 28, 2018.

22 This is the first continuance in this case sought by Defendant. There is good cause for this
23 request. Defendant is seeking this extension due to Defendant's counsel's crowded briefing schedule
24 with multiple deadlines on or around September 14, 2018, including cases that had been previously
25 extended. In addition, new matters that were not previously anticipated, had arisen and have created
26 some crowding of the briefing schedule around the due date of this case. Because of the factors

1 described above, Defendant is requesting additional time up to and including September 28, 2018, to
2 fully review the administrative record and research the issues presented by Plaintiff's motion to remand.
3 This request is made in good faith with no intention to unduly delay the proceedings.

4 Therefore, with this Court's approval, the Court's scheduling order shall be extended by 14 days,
5 so that Defendant may file her opposition to Plaintiff's motion to remand on or before September 28,
6 2018.

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8 Respectfully submitted,

9 Dated: September 14, 2018

LAW OFFICES OF LAWRENCE D. ROHLFING

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11 /s/ Cyrus Safa
12 (as authorized via e-mail on 9/14/2018)
CYRUS SAFA
Attorneys for Plaintiff

13 Dated: September 14, 2018

STEVEN W. MYHRE
Acting United States Attorney

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15 /s/ Carolyn B. Chen
16 CAROLYN B. CHEN
Special Assistant United States Attorney

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20 ORDER

21 PURSUANT TO THE STIPULATION, IT IS SO ORDERED.

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23 DATED: September 17, 2018.

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HON. WILLIAM G. COBB
UNITED STATE MAGISTRATE JUDGE